

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION, CANTON**

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In re:	: Case No. 20-61308
	:
A.R.M. OPCO, INC.	: Chapter 11
	:
Debtor and	: Judge Russ Kendig
Debtor-in-Possession.	:
	:
(Employer Tax I.D. No. 46-4283819)	:
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**AMENDED NOTICE OF FILING OF DEBTOR'S FIRST DAY  
PAPERS AND MOTIONS**

PLEASE TAKE NOTICE OF THE FOLLOWING:

The above-captioned debtor and debtor in possession (the "Debtor"), has filed the motions and applications listed below on August 20, 2020:

**APPLICATION OF THE DEBTOR FOR AUTHORITY  
TO RETAIN AND EMPLOY ANTHONY J. DEGIROLAMO  
AS COUNSEL FOR THE DEBTOR**

**APPLICATION OF THE DEBTOR FOR AUTHORITY  
TO RETAIN AND EMPLOY TZANGAS, PLAKAS & MANNOS, LTD  
AS SPECIAL COUNSEL FOR THE DEBTOR**

**MOTION OF DEBTOR FOR ENTRY OF AN ORDER  
(I) ESTABLISHING PROCEDURES FOR INTERIM COMPENSATION AND  
REIMBURSEMENT OF EXPENSES OF PROFESSIONALS ON A MONTHLY BASIS  
AND (II) LIMITING SERVICE OF NOTICES  
OF HEARINGS ON INTERIM APPLICATIONS FOR COMPENSATION**

**MOTION OF DEBTOR FOR AN ORDER CONFIRMING THE  
ADMINISTRATIVE EXPENSE PRIORITY STATUS OF DEBTOR'S  
UNDISPUTED OBLIGATIONS TO SUPPLIERS FOR THE POSTPETITION  
DELIVERY OF GOODS AND PROVISION OF SERVICES AND  
FOR AUTHORITY TO PAY PREPETITION ADMINISTRATIVE CLAIMS  
PURSUANT TO 11 U.S.C. § 503(B)(9)**

**MOTION OF THE DEBTOR FOR ENTRY OF INTERIM AND FINAL  
ORDERS AUTHORIZING: (A) THE DEBTOR'S USE OF CASH COLLATERAL  
PURSUANT TO SECTION 363 OF THE BANKRUPTCY CODE; (B) AUTHORIZING  
DEBTOR TO OBTAIN SECURED POSTPETITION FINANCING PURSUANT TO  
SECTION 364 OF THE BANKRUPTCY CODE; AND (C) APPROVING AND  
AUTHORIZING DEBTOR TO ENTER INTO CERTAIN RELATED LOAN  
DOCUMENTS**

**MEMORANDUM IN SUPPORT OF DEBTOR'S MOTION FOR ORDER  
AUTHORIZING INTERIM AND FINAL USE OF CASH COLLATERAL**

**DEBTOR'S MOTION FOR ORDER AUTHORIZING (I) THE SALE OF  
SUBSTANTIALLY ALL OF ITS ASSETS, FREE AND CLEAR OF LIENS, CLAIMS,  
ENCUMBRANCES, AND INTERESTS AND (II) THE  
ASSUMPTION AND ASSIGNMENT OF CERTAIN EXECUTORY  
CONTRACTS AND UNEXPIRED LEASES**

**MEMORANDUM IN SUPPORT OF DEBTOR'S MOTION FOR ORDER  
AUTHORIZING (I) THE SALE OF SUBSTANTIALLY ALL OF ITS ASSETS FREE  
AND CLEAR OF LIENS, CLAIMS, ENCUMBRANCES, AND INTERESTS; AND (II)  
THE ASSUMPTION AND ASSIGNMENT OF CERTAIN EXECUTORY CONTRACTS  
AND UNEXPIRED LEASES**

Respectfully submitted,

/s/ Anthony J. DeGirolamo  
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PROPOSED COUNSEL FOR  
THE DEBTOR AND  
DEBTOR IN POSSESSION